

**REDACTED – PUBLIC VERSION**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**SMITH KLINE & FRENCH LABORATORIES  
LIMITED and SMITHKLINE BEECHAM  
CORPORATION d/b/a GLAXOSMITHKLINE,**

**Plaintiffs**

**vs.**

**TEVA PHARMACEUTICALS USA, INC.**

**Defendant.**

**Civil Action No. 05-197 (GMS)**

**FILED UNDER SEAL**

**DECLARATION OF KAREN E. KELLER IN SUPPORT OF TEVA'S MOTION  
IN LIMINE NO. 4 TO EXCLUDE EVIDENCE AND TESTIMONY  
ON PATENT PROSECUTION**

I, Karen E. Keller, declare as follows:

I am admitted to this Court and am an associate with the law firm of Young Conaway Stargatt & Taylor, LLP, counsel of record for Defendant Teva Pharmaceuticals USA, Inc. in this action.

1. Attached hereto as Exhibit A is a true and correct copy of the April 5, 2006 Notice of Deposition to Plaintiffs GlaxoSmithKline.
2. Attached hereto as Exhibit B is a true and correct copy of excerpts of the May 5, 2006 Deposition of Gregory Gallagher.
3. Attached hereto as Exhibit C is a true and correct copy of excerpts of the May 26, 2006 Deposition of David Owen.

4. Attached hereto as Exhibit D is a true and correct copy of excerpts from Plaintiffs' August 16, 2006 Third Supplemental Responses to Teva's Interrogatories.

5. Attached hereto as Exhibit E is a true and correct copy of excerpts of the July 20, 2006 Deposition of Peter Giddings.

6. Attached hereto as Exhibit F is a true and correct copy of Teva's Revised Second 30(b)(6) Notice of Deposition.

7. Attached hereto as Exhibit G is a true and correct copy of the May 30, 2006 Letter from Michael Gordon to Charanjit Brahma.

8. Attached hereto as Exhibit H is a true and correct copy of the June 2, 2006 Letter from Charanjit Brahma to Michael Gordon.

9. Attached hereto as Exhibit I is a true and correct copy of the June 27, 2006 Letter from Mark Rienzi to Charanjit Brahma.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Wilmington, DE.

Dated: October 23, 2006

Respectfully submitted,

/s/ Karen E. Keller  
Karen E. Keller

**CERTIFICATE OF SERVICE**

I, Karen E. Keller, Esquire, hereby certify that on October 30, 2006, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

Patricia Smink Rogowski, Esquire  
Connolly, Bove, Lodge & Hutz LLP  
The Nemours Building  
1007 North Orange Street  
Wilmington, DE 19801

I further certify that on October 30, 2006, I caused a copy of the foregoing document to be served by hand delivery on the above-listed counsel of record and the following non-registered participant in the manner indicated:

**BY E-MAIL ON OCTOBER 30, 2006 AND**  
**BY FEDERAL EXPRESS ON OCTOBER 31, 2006**

William F. Lee, Esquire  
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*/s/ Karen E. Keller*

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